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Attorney for Defendant,
Vanguard Logistics Services (USA), Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK VICINAGE**

GARY BEAUMONT,	:	
	:	No. 2:22-cv-02715-WJM-LDW
Plaintiff,	:	
	:	
v.	:	NOTICE OF MOTION TO
	:	TRANSFER VENUE TO
	:	THE UNITED STATES
VANGUARD LOGISTICS SERVICES (USA),	:	DISTRICT COURT FOR
INC. and JOHN DOES 1-10	:	THE SOUTHERN DISTRICT
(Fictitious Name)	:	OF NEW YORK
and ABC COMPANIES 1-10	:	
(Fictitious Name),	:	
	:	
Defendants.	:	

TO: Steven D. Rothblatt, Esquire
LAW OFFICES OF STEVEN D. ROTHBLATT
197 Route 18 South, Suite 3000
East Brunswick, NJ 08816

PLEASE TAKE NOTICE that upon the annexed Certification of George P. Hassapis, sworn to on May 25, 2022, and the accompanying Memorandum of Law, the undersigned counsel for defendant, Vanguard Logistics Services (USA), Inc., will move this Court, before the Honorable William J. Martini, on June 21, 2022 at the United States District Court for the District of New Jersey, Martin Luther King Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey for an Order, pursuant to 28 U.S.C. §1404(a), transferring venue in this action to the United States District Court for the Southern District of New York, and for such other and further relief as this Honorable Court deems just and proper under the circumstances.

Respectfully submitted,

LAW OFFICES OF GEORGE N. STYLIADES

/s/ George N. Styliades
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Date: May 26, 2022